

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

BRIAN CUMMINGS,)	
)	
Plaintiff,)	
)	
v.)	Case No. 3:22-cv-00301
)	
BRETTON KEEFER, on behalf of the)	Chief Judge Waverly D. Crenshaw, Jr.
deceased CHESTA SHOEMAKER,)	Magistrate Judge Alistair E. Newbern
AFSOON HAGH, and)	
JEANNE BURTON, Trustee on behalf)	
of CUMMINGS MANOOKIAN, PLC,)	
)	
Defendants.)	

DECLARATION NUMBER 4 OF JAMES W. PRICE, JR.

I am James W. Price, Jr., counsel for the above-named Plaintiff, Brian Cummings. In addition to the facts set forth in my Declarations previously filed with this Court (Doc. Nos. 19, 25, 28), the following facts are true based upon my personal knowledge:

1. I exchanged correspondence with Defendant Afsoon Hagh in February 2022, prior to filing this case in the Circuit Court for Davidson County, Tennessee. In a letter dated February 21, 2022, Defendant Hagh advised me that she preferred to receive correspondence by letter at 1906 Glen Echo Road, 150229, Nashville, Tennessee 37215. When I attempted service by Certified Mail in March of 2022, I sent the Amended Complaint and Summons to the address that she stated was her preferred address. This Certified Mail package was ultimately returned to me, with the United States Postal Service notation “Unclaimed” on the envelope.

2. After the case was removed to this Court, I requested an Alias Summons from the Clerk of Court and made a second attempt to serve Defendant Hagh at her preferred address. This

Certified Mail package was again returned to me, with the United States Postal Service notation "Unclaimed" on the envelope.

3. Having exhausted all regular attempts at service, as described herein and in my previous Declarations, I believe that only the U.S. Marshal or his designated deputy can serve Defendant Hagh.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 21, 2022.

Respectfully Submitted,

/s/ James W. Price, Jr.

James W. Price, Jr., #3538
Attorney for Plaintiff
Price, Hill, Kolarich, & Moore
214 2nd Avenue North, Suite 205
Nashville, TN 37201
(615) 244-5772

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served on this the 21st day of September, 2022, via the Court's electronic filing system on the following:

Phillip G. Young, Jr.
Thompson Burton PLLC
1801 West End Avenue, Suite 1550
Nashville, TN 37203
phillip@thompsonburton.com

and via United States First Class mail, postage prepaid on the following:

Bretton Keefer
5960 Pumpkintown Lane
Lafayette, TN 37083

Afsoon Hagh
Hagh Law PLC
1906 Glen Echo Road, #150229
Nashville, TN 37215

/s/ James W. Price, Jr.
James W. Price, Jr.